

JUN 4 1975

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

religion confuct Folds

OLIN CORPORATION (JOLILY)	)	
	)	
V•	)	PCB 75-214
	)	
ENVIRONMENTAL PROTECTION AGENCY	)	

### AMENDMENT TO PETITION FOR VARIANCE

Olin Corporation (Joliet) hereby petitions to amend its pending petition for variance by the addition of a new paragraph 17 as set forth in Appendix  $\Lambda$  attached hereto.

The additional paragraph 17 supplements existing paragraphs 10 and 12 to the effect that the attainment and/or maintenance of air quality standards will not be significantly affected by the grant of the requested variance. This language is intended to comply with recent rulings of the Board and regulations announced by the United States Environmental Protection Agency pursuant to the decision of the United States Supreme Court in NRDC v. Train.

Of Counsel:

George E. Bullwinkel
Gene H. Hansen
Price, Cushman, Keck,
Mahin & Cate
8300 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606

Respectfully submitted,

Attorney for Utin Corporation

17. The grant of the variance requested herein will have no significant adverse effect upon the attainment of air quality standards in the regions affected, or upon the maintenance of such standards once attainment has been achieved.

#### CERTIFICATE OF SERVICE

I certify that one copy of the foregoing petition to amend was sent by first class mail to the individuals set forth below on June 4, 1975.

Seorge El Bullwinke

Ms. Kathryn S. Nesburg
Environmental Protection Agency
Enforcement Section
Division of Air Pollution Control
309 West Washington Street
Chicago, Illinois 60606

Mr. Richard W. Cosby Assistant Attorney General 188 West Randolph Street Room 2315 Chicago, Illinois 60601

		•
STATE OF ILLINOIS COUNTY OF WILLIAMSON	) ) ) )	: :
BEFORE THE	ILLINOIS POLI	LUTION CONTROL BOARD
OLIN CORPORATION,  Petitic  vs.  ENVIRONMENTAL PROTECTION AGE  Response	) ) ENCY, )	PCB <b>74-335</b>
	NOTICI	<u>.</u>
Patrick O. Boyl TO: OLIN CORPORATIO East Alton, Ill	N	•.
•		
PLEASE TAKE NOTICE that	: I have today	filed in the Office of the
Clerk of the Pollution Contr	rol Board, the	Agency's Recommendation,
a		
cory of which is herewith se	erved upon you	1.
		ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS
•		Ry: Milliam A. Erdman, Attorney Enforcement Section Division of Air Pollution Control
DATED: October 30, 1974	-	
2200 Churchill Road Springfield, Illinois 62706	•	

(VP-11)

STATE OF ILLINOIS	)	
	)	SS:
COUNTY OF WILLIAMSON	)	

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

OLIN CORPORATION,		)	
	Petitioner,	)	
vs.		į	DCD 74 775
ENVIRONMENTAL PROTE	CTION AGENCY,	\{	PCB 74-335
	Respondent.	)	

## RECOMMENDATION

The following is the report of investigation and Recommendation of the Environmental Protection Agency with regard to the above entitled matter.

## INTRODUCTION:

- 1. On September 11, 1974, the Agency received the Petition for Variance of Olin Corporation.
- 2. Olin Corporation (hereinafter "Olin") is responsible for the manufacturing of various propellant and pyrotechnic products at a facility located within Williamson County, near Marion, Illinois. The subject of this Variance is the disposal of explosive and pyrotechnic wastes generated during the manufacturing process.
- 3. The exact amount of explosive and pyrotechnic wastes to be generated by Olin during the one year period of this Variance is uncertain.

However, Olin estimates that the maximum amount to be generated on a weekly basis is as follows:

Ammonium Nitrate Propellant	500 lbs.
Double Base Propellant	300 lbs.
RDX Type Explosive	200 1bs.
Single Base Propellant	20 lbs.
Ammonium Perchlorate Propellant	20 lbs.
Boron-Potassium Nitrate Propellant	200 lbs.
Black Powder	10 lbs.
Nitroglycerine in Sawdust	25 lbs.
Potassium Perchlorate Propellant	20 lbs.
Firecracker Mix	50 lbs.
Colored Smoke Mix	100 lbs.
Contaminated Packaging	200 lbs.
Pyrotechnic Flare Scrap	<b>50</b> 1bs.

less than the amount during the variance period of this last year.

4. Olin has been before the Pollution Control Board several times before because of the disposal problems of pyrotechnic and explosive wastes. (See PCB 71-60, 6-28-71; PCB 71-231, 2-18-72; PCB 72-357, 10-31-72; PCB 72-517, 3-22-73 and PCB 73-395, 12-13-73). Olin now seeks a variance in order to continue to use its pyrotechnic destructor since its emissions exceed the limits of Chapter 2, Rules 203(d) and 206(b). In addition, Olin seeks a clarification of, or a variance from, Rules 103 and 104. In the alternative, Olin seeks a variance from Rules 502 and Section 9(c) of the Environmental Protection Act.

# Investigation and Consideration -

5. Initially, Olin obtained a variance from the Pollution Control Board in order to open burn pyrotechnic and explosive wastes while controlled methods of thermal destruction were investigated. Eventually, Olin itself

#### STATE OF ILLINOIS

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Olin Corporation,

Petitioner

vs.

Environmental Protection Agency

Respondent

No.		 

September 24, 1974

### PETITION FOR VARIANCE

COMES NOW Olin Corporation, a Virginia corporation authorized to do business in the State of Illinois, and files its Petition for Variance from the provisions of Rules 104 (b) (2), 104 (c) (1) and 104 (d) of the Illinois Air Pollution Regulations which require that a Compliance Program and/or a Project Completion Schedule, or a revision thereof, have a final compliance date not later than the applicable date prescribed in Chapter 2, Part II of said Regulations, In support thereof, Petitioner states as follows:

1. Petitioner operates a plant, consisting of an area of approximately 1,732 acres at East Alton, Illinois, which in its Zones 1 and 7, it manufactures brass strip and fabricated products, metallic and shot shell ammunition, and operates a steam generating power plant (hereinafter called the "Power Plant") and a potable water treatment plant; and in its Zone 4, Petitioner manufactures shot shell ammunition and

primer explosives. The waste water from Zones 1, 4 and 7 are treated through Petitioner's Central Waste Water

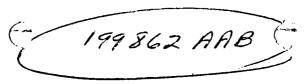
Treatment Facility. Approximately 5,700 employees are currently employed at Petitioner's East Alton location.

2. Petitioner's Power Plant consists of two (2) 75,000#/Hr. boilers and two (2) 150,000#/Hr. boilers, as described in Operating Permit Application No. 0 3 02 0375, I.D. No. 119 020 AAG. The two 75,000#/Hr. boilers (designated boiler numbers 1 and 2) are maintained in wet lay up and are not operated unless an outage of either of the 150,000#/Hr. boilers necessitates their start-up. The two 150,000#/Hr. boilers (designated boiler numbers 3 and 4) operate together to supply the steam load during normal operations.

All of the boilers have the capability of using either natural gas or coal, or both, as a fuel supply. However, boiler #4, because it is a pressurized continuous slag tapping wet bottom design, must have 80% of its rated output supplied by coal firing before natural gas can be used to supplement the coal when both fuels are fired simultaneously.

Petitioner's natural gas supply can be supplemented with propane-air mixtures up to 125,000 CFH of natural gas equivalent by Petitioner's own owned and operated Propane-Air Plant, (see Operating Permit Application number 0 3 03 1117, I.D. number 119 020 AAI).

3. a. Prior to October of 1970, Petitioner's Power Plant was operated on high sulfur coal for approximately five (5) months per year (November through March) and on an interruptible gas supply for approximately seven (7) months per year.



# ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL

# REGIONAL VARIANCE INVESTIGATION

	3 1 to 6 1 4	7 2.50
	1990554	ark
(11.	9862	AAB

Date 9/18/74

			Region 5
Date Filed:	9/11/74		
Date Received b	y Region: 9/13/74	Date Recommend	ation Due: 9/27/74
Prepared By:	(Hohmieclack)	Approved By:	Date: <u>9-19-74</u>
Cate Forwarded	to Springfield: 9/1	9/74	
Date Region Cal	led: 9/11/74	By Whom: D	ick Pressler
Full Name & Add	ress of Petitioner:	. Olin Corporati	on 74-335
		Marion	
	-	Illinois 629	59
		WILLIAMSON COU	NTY
EPE Responsible	for Preparation of Va	riance Investigation:	
Name:	M. Paul Schmierbach	Ph	one: 618/997-4371
Attorney Respon	sible for Presentation	of Agency Recommenda	tion:
Name:	•	Ph	one:
Relief Sought:	Act: 9(c)		
Regulation: Rule 505 or 203(e), 206(b), 103, 104			03, 104
	Time Period: One Year		
Enforcement Referral: Yes No x Date:			Date:
	Federal EPA Involvemen	nt: Yes	No. x
		•	1400, C
		<b>'</b> -c	>// <sub>2</sub>